

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
KEVIN CHARLES HERSH, SR	:	
KRISTEN ELIZABETH HERSH	:	
	:	
Debtor(s)	:	No. 23-11336 amc

**ANSWER TO THE MOTION OF PENNYMAC LOAN SERVICES, LLC FOR RELIEF FROM  
THE AUTOMATIC STAY**

COMES NOW, Kevin Charles Hersh, Sr. and Kristen Elizabeth Hersh, Debtors and Respondents, through counsel of record, Michele Perez Capilato, Esquire, and submit the following in response to the Motion for Relief from the Automatic Stay filed herein:

1-5. DENIED. The averments contained in these Paragraphs consist of summarizations or mischaracterizations of documents that speak for themselves, and they are denied as no response is required.

6-9. DENIED. Debtors acknowledge falling behind with post-petition mortgage payments due to a slow period at work for Mr. Hersh. However, Debtors disagree with the total amount of arrears alleged in the Motion. Debtors are currently gathering proof of payments and will forward receipts to Counsel. Debtors are desirous of entering into a Stipulation to resolve the remaining arrears.

10. Denied. Debtors cannot admit or deny this statement, therefore, it is denied.

WHEREFORE, Debtors/Respondents prays that Movant's Motion be DENIED, and that Debtors/Respondents receive judgment for reasonable costs and attorney fees incurred in connection with the defense of this Motion.

May 5, 2024

Respectfully submitted,

Law Offices of Michele Perez Capilato

By: /s/ Michele Perez Capilato

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